Mr. Geoffrey Wortley
American National Can Co.
8770 W. Bryn Mawr Avenue
Chicago, IL 60631-3542

Re: 127-11554
Minor Source Modification to:
Part 70 permit No.: T127-7651-00030

Dear Mr. Wortley:

American National Can Company was issued Part 70 operating permit T127-7651-00030 on January 12, 1999, for a stationary beverage can end manufacturing plant. An application to modify the source was received on November 17, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

One (1) can end manufacturing line, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner and one (1) six out shell press, with a maximum capacity of 120,000 ends per hour, with no controls, and exhausting to the atmosphere.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to the emission unit are attached to this Source Modification approval and include a new Section D.2 for Module #5 process line and a new quarterly report form for Module #5. In addition to these new operating conditions, the approval to construct the new Module #5 is dependent on modifications to existing conditions in Section D.1 of the Part 70 permit such that the Emission Offset requirements (326 IAC 2-3) will not apply. These proposed new operating conditions and the changes to existing operating conditions shall be incorporated into the Part 70 operating permit as a Minor Permit Modification in accordance with 326 IAC 2-7-10.5 and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Janusz Johnson or extension 2-8325, or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments - proposed operating conditions (4 pages)
JKJ
cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
Northwest Regional Office (NWRO)
Air Compliance Section Inspector - Dave Sampias
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(5) One (1) can end manufacturing line, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner and one (1) six out shell press, with a maximum capacity of 120,000 ends per hour, with no controls, and exhausting to the atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b) (Can Coating Operations), the emissions from the beverage can coating operation shall not discharge volatile organic compounds in excess of the following:

Coating	326 IAC 8-2-3(b)(4) Limit (lb VOC/gal), less water
End Seal Coat	3.7

D.2.2 Volatile Organic Compounds (VOC) Limitations [326IAC 2-3]

Pursuant to 326 IAC 2-3, the total amount of VOC usage from the Module #5 can end manufacturing line shall be limited to 783.3 pounds per month. This limited usage is equivalent to 4.7 tons of VOC emissions per year.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the end seal coating facility shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions C.1 and D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Condition D.2.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage in Module #5 for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Particulate Matter (PM)

Pursuant to CP 127-4956-00030, issued on January 22, 1996, the overspray from the end seal coating facilities shall be considered in compliance provided that the overspray is not:

(a) visibly detectable at the exhaust;

(b) detectable on the rooftops; or

(c) detectable on the ground.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2:

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: American National Can Company
Source Address: 4001 Montdale Park Drive, Valparaiso, IN 46383
Mailing Address: 8770 West Bryn Mawr Avenue, Chicago, IL 60631-3504
Part 70 Permit No.: T127-7651-00030
Facility: Module #5
Parameter: VOC
Limit: 783.3 pounds/month

YEAR: _____

Month	Module 5
	Input VOC
Month 1	
Month 2	
Month 3	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Source Modification.

Source Background and Description

Source Name:	**American National Can Company**
Source Location:	**4001 Montdale Park Drive, Valparaiso, IN 46383**
County:	**Porter**
SIC Code:	**3411**
Operation Permit No.:	**T127-7651-00030**
Operation Permit Issuance Date:	**January 12, 1999**
Minor Source Modification No.:	**127-11554-00030**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Management (OAM) has reviewed a modification application from American National Can Company relating to the construction of the following emission units and pollution control devices:

> One (1) can end manufacturing line, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner and one (1) six out shell press, with a maximum capacity of 120,000 ends per hour, with no controls, and exhausting to the atmosphere.

History

On January 12, 1999, American National Can Company was issued a Part 70 permit. The Part 70 permit included VOC usage limiting conditions which defined the increased maximum capacity of the existing four (4) production modules permitted under CP 127-4956-00030. The source's potential to emit VOCs, prior to that modification (replacement of 13 lid liners with 16 new lid liners), was 42.8 tons/yr. The potential to emit VOCs, as referenced in the Title V application, was 73 tons/yr based on the maximum capacity increase from 1,264,000 ends/hr to 1,360,800 ends/hr. In order to ensure non-applicability of the Emission Offset requirements for the original modification, the source was limited in the Part 70 permit to 42.8 tons per year (potential prior to modification) plus 24.8 tons per year, a total limit of 67.6 tons per year. The emission increase due to the modification was limited to 24.8 tons/yr; therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements did not apply.

On November 17, 1999, American National Can Company submitted the application to add an additional line (Module #5) to increase production capacity of the plant. American National Can Company stated that the actual increase in the potential to emit (PTE) volatile organic compounds (VOC) from the previous increase in capacity of Modules #1-4 was less than the 24.8 tons/yr anticipated. American National Can Company requested that the emission limit established for the previous expansion be revised to more accurately reflect the actual emissions increase to 20.2 tons per year. This revision will allow for a limited increase in actual emissions from the new Module #5 without the total contemporaneous emission increases exceeding the de minimus level and triggering the applicability of Emission Offset (326 IAC 2-3) requirements.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 17, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.4
PM-10	1.4
SO_2	0.0
VOC	6.4
CO	0.0
NO_x	0.0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(10) because the source is located in Porter County and the potential to emit (PTE) of the modification is greater than 15 pounds per day, but less than 25 tons per year.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
TSP	attainment
PM-10	unclassifiable
SO_2	attainment
NO_2	unclassifiable/attainment
Ozone	severe nonattainment
CO	unclassifiable/attainment
Lead	not designated

(a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.

(b) Porter County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	67.6
CO	less than 100
NOx	less than 100

(a) This existing source is a major stationary source because volatile organic compounds (VOC), a precursor to the severe non-attainment regulated pollutant ozone, is emitted at a rate of 25 tons per year or more.

(b) These emissions are based upon the Technical Support Document (TSD) for Part 70 Permit (127-7651-00030).

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the current project and the other emission increases occurring at the source in the contemporaneous period of five (5) years.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Module #5 (new)				4.7			
Modification to existing Modules #1-#4 permitted January 22, 1996 (CP 127-4956-00030)				20.2			
Total contemporaneous emissions increase				24.9			
De minimus significant threshold (Emission Offset)				25			

(a) This modification to an existing major stationary source is not major because the net emissions increase is considered de minimus and less than Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

(b) The volatile organic compound (VOC) usage in Modules #1-#4 is limited to 5.25 tons per month, therefore, Emission Offset (326 IAC 2-3) requirements do not apply. This limit is equivalent to 63.0 tons of VOC emissions per year. The contemporaneous increase associated with these units, based on the limitation, is 20.2 tons per year.

(c) The volatile organic compound (VOC) usage in Module #5 is limited to 783.3 pounds per month, therefore, Emission Offset (326 IAC 2-3) requirements do not apply. This limit is equivalent to 4.7 tons of VOC emissions per year. The contemporaneous increase associated with this unit is based on this limitation is 4.7 tons per year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification. American National Can Company is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.490, Subpart WW), because they do not perform exterior base coating, overvarnish coating or inside spray coating operations.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63) applicable to this source.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds and is located in Porter County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the end seal coating facility (Module #5) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The overspray from the end seal coating facility shall be considered in compliance provided that the overspray is not:

(a) visibly detectable at the exhaust;

(b) detectable on the rooftops; or

(c) detectable on the ground.

326 IAC 8-2-3 (Can Coating Operations)

Can coating emission limitations as specified under 326 IAC 8-2-3 are applicable to facilities in Porter County for which construction commences after July 1, 1990 and which have actual emissions of greater than 15 pounds per day. Pursuant to 326 IAC 8-2-3(b), the emissions from the beverage can coating operations shall not discharge volatile organic compounds in excess of the following:

Coating	326 IAC 8-2-3(b)(4) Limit (lb VOC/gal), less water
End Seal Coat	3.7

The pounds of VOC per gallon contents of the coatings, less water, delivered to the applicator for the end seal coating are less than the 326 IAC 8-2-3 limit, therefore, each coating complies

with this rule. Note, the tab lube is not an end seal compound, therefore, it need not comply with 326 IAC 8-2-3.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The end seal coating facilities have applicable monitoring conditions as specified below:

    (a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 3.7 lb/gal of coating, excluding water.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-3.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed **Part 70 Minor Source Modification No. 127-11554-00030**.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Source Modification.

Source Background and Description

Source Name:	**American National Can Company**
Source Location:	**4001 Montdale Park Drive, Valparaiso, IN 46383**
County:	**Porter**
SIC Code:	**3411**
Operation Permit No.:	**T127-7651-00030**
Operation Permit Issuance Date:	**January 12, 1999**
Minor Source Modification No.:	**127-11554-00030**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Management (OAM) has reviewed a modification application from American National Can Company relating to the construction of the following emission units and pollution control devices:

> One (1) can end manufacturing line, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner and one (1) six out shell press, with a maximum capacity of 120,000 ends per hour, with no controls, and exhausting to the atmosphere.

History

On January 12, 1999, American National Can Company was issued a Part 70 permit. The Part 70 permit included VOC usage limiting conditions which defined the increased maximum capacity of the existing four (4) production modules permitted under CP 127-4956-00030. The source's potential to emit VOCs, prior to that modification (replacement of 13 lid liners with 16 new lid liners), was 42.8 tons/yr. The potential to emit VOCs, as referenced in the Title V application, was 73 tons/yr based on the maximum capacity increase from 1,264,000 ends/hr to 1,360,800 ends/hr. In order to ensure non-applicability of the Emission Offset requirements for the original modification, the source was limited in the Part 70 permit to 42.8 tons per year (potential prior to modification) plus 24.8 tons per year, a total limit of 67.6 tons per year. The emission increase due to the modification was limited to 24.8 tons/yr; therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements did not apply.

On November 17, 1999, American National Can Company submitted the application to add an additional line (Module #5) to increase production capacity of the plant. American National Can Company stated that the actual increase in the potential to emit (PTE) volatile organic compounds (VOC) from the previous increase in capacity of Modules #1-4 was less than the 24.8 tons/yr anticipated. American National Can Company requested that the emission limit established for the previous expansion be revised to more accurately reflect the actual emissions increase to 20.2 tons per year. This revision will allow for a limited increase in actual emissions from the new Module #5 without the total contemporaneous emission increases exceeding the de minimus level and triggering the applicability of Emission Offset (326 IAC 2-3) requirements.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 17, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.4
PM-10	1.4
SO_2	0.0
VOC	6.4
CO	0.0
NO_x	0.0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(10) because the source is located in Porter County and the potential to emit (PTE) of the modification is greater than 15 pounds per day, but less than 25 tons per year.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
TSP	attainment
PM-10	unclassifiable
SO_2	attainment
NO_2	unclassifiable/attainment
Ozone	severe nonattainment
CO	unclassifiable/attainment
Lead	not designated

(a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.

(b) Porter County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	67.6
CO	less than 100
NOx	less than 100

(a) This existing source is a major stationary source because volatile organic compounds (VOC), a precursor to the severe non-attainment regulated pollutant ozone, is emitted at a rate of 25 tons per year or more.

(b) These emissions are based upon the Technical Support Document (TSD) for Part 70 Permit (127-7651-00030).

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the current project and the other emission increases occurring at the source in the contemporaneous period of five (5) years.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Module #5 (new)				4.7			
Modification to existing Modules #1-#4 permitted January 22, 1996 (CP 127-4956-00030)				20.2			
Total contemporaneous emissions increase				24.9			
De minimus significant threshold (Emission Offset)				25			

(a) This modification to an existing major stationary source is not major because the net emissions increase is considered de minimus and less than Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

(b) The volatile organic compound (VOC) usage in Modules #1-#4 is limited to 5.25 tons per month, therefore, Emission Offset (326 IAC 2-3) requirements do not apply. This limit is equivalent to 63.0 tons of VOC emissions per year. The contemporaneous increase associated with these units, based on the limitation, is 20.2 tons per year.

(c) The volatile organic compound (VOC) usage in Module #5 is limited to 783.3 pounds per month, therefore, Emission Offset (326 IAC 2-3) requirements do not apply. This limit is equivalent to 4.7 tons of VOC emissions per year. The contemporaneous increase associated with this unit is based on this limitation is 4.7 tons per year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification. American National Can Company is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.490, Subpart WW), because they do not perform exterior base coating, overvarnish coating or inside spray coating operations.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63) applicable to this source.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds and is located in Porter County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the end seal coating facility (Module #5) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The overspray from the end seal coating facility shall be considered in compliance provided that the overspray is not:

(a) visibly detectable at the exhaust;

(b) detectable on the rooftops; or

(c) detectable on the ground.

326 IAC 8-2-3 (Can Coating Operations)

Can coating emission limitations as specified under 326 IAC 8-2-3 are applicable to facilities in Porter County for which construction commences after July 1, 1990 and which have actual emissions of greater than 15 pounds per day. Pursuant to 326 IAC 8-2-3(b), the emissions from the beverage can coating operations shall not discharge volatile organic compounds in excess of the following:

Coating	326 IAC 8-2-3(b)(4) Limit (lb VOC/gal), less water
End Seal Coat	3.7

The pounds of VOC per gallon contents of the coatings, less water, delivered to the applicator for the end seal coating are less than the 326 IAC 8-2-3 limit, therefore, each coating complies

with this rule. Note, the tab lube is not an end seal compound, therefore, it need not comply with 326 IAC 8-2-3.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The end seal coating facilities have applicable monitoring conditions as specified below:

    (a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 3.7 lb/gal of coating, excluding water.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-3.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed **Part 70 Minor Source Modification No. 127-11554-00030**.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: American National Can Company
Address City IN Zip: 4001 Montdale Park Drive, Valparaiso, IN 46383
County: Porter
Source Mod. No.: 127-11554-00030
Reviewer: Janusz Johnson
Date: December 30, 1999

Potential Emissions from new module

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Darex 4208-66	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	9.0E-06	120000.000	0.00	0.00	0.00	0.00	0.00	0.64	0.00	98%
Darex 4355HS LV	10.7	32.00%	32.0%	0.0%	41.0%	59.00%	9.0E-06	120000.000	0.00	0.00	0.00	0.00	0.00	0.69	0.00	98%
AMCO 4880	6.4	87.60%	0.0%	87.6%	0.0%	11.30%	2.2E-06	120000.000	5.56	5.56	1.47	35.24	6.43	0.02	49.23	98%

State Potential Emissions **6.43** **1.35**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used